

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-cv-60984-Augustin-Birch**

[Consent Case]

MELINDA MICHAELS,

Plaintiff,

v.

SEAWATER PRO LLC, and  
MICHAEL SPANOS A/K/A MIKE SPANOS,

Defendants.

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**JOINT MOTION FOR SECOND ENLARGEMENT OF TIME**

Plaintiff MELINDA MICHAELS, and Defendants SEAWATER PRO LLC and MICHAEL SPANOS A/K/A MIKE SPANOS, through their undersigned counsel and pursuant to the Court's Order on Notice of Settlement [ECF No. 84] ("Order"), and Paperless Order [ECF No. 86] ("Paperless Order"), respectfully requests a final enlargement of time seven days, through November 13, 2025, to submit the documents required by the Order and in support Plaintiff states the following:

Counsel have continued to exchange revisions on the final written Settlement Agreement but due to the existence of counsel for both parties outside of this proceeding, it has made it difficult to efficiently finalize the terms of the agreement within the Court's deadlines. The parties are at near end revisions but still need a brief enlargement of time of one week to get over the goalpost. The Paperless Order was clear that "The Court will not further extend this deadline." However, given the complexities of this case, the joint spirit of this motion, and the continued

good faith participation from both parties and their counsel, in an effort to properly and fully resolve the matter, the parties need a brief extension.

Federal Rule of Civil Procedure 6(b)(1) states that when a deadline exists for a party to act, the court “for cause shown may at any time in its discretion with or without motion or notice order the period enlarged if request thereof is made before the expiration of the period originally prescribed or as extended by previous order”. The current deadline to file the respective documents is today, November 6, 2025 (ECF No. 86).

WHEREFORE, the Parties respectfully request an enlargement of time through November 13, 2025, to submit the documents required by the Order.

Respectfully Submitted,

Dated: November 6, 2025

/s/Dillon S. Cuthbertson  
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